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September 25, 2020

**VIA ECF**

Hon. Lorna G. Schofield  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Erica Mendoza v. Kidz Korner of New Rochelle Inc, et al.  
Case No.: 20 Civ. 5761 (LGS)

Dear Judge Schofield:

We represent all defendants in the above referenced action and write seeking a stay this proceeding for thirty days, as we have just been retained and need time to review relevant client documentation and materials and thereafter file an answer in this matter.

Defendant Ivy Rentz received a copy of the complaint in this action on September 16, 2020, by mail from the Secretary of State of the State of New York (Dkt. No 17). Ms. Rentz has yet to be personally served a copy of the complaint.<sup>1</sup> Three days later on Saturday, September 19, 2020, Ms. Rentz and I met to discuss this case and at the end of that meeting, Ms. Rentz requested that I represent her in this action. On September 24, 2020, four business days later, Ms. Rentz and I finalized her retention of me as her counsel. On that same day, my office filed our Notice of Appearance and Rule 7.1 statements (Dkt. Nos. 23, 24, 25).

In sum, any delay or default in this action is of no fault of Ms. Rentz. Accordingly, as stated above, we respectfully request a stay in this action for thirty days in order to review all relevant client documentation and materials and thereafter file an answer in this action.

This request for a thirty day stay is on consent of plaintiff's counsel Ms. Clela Errington.

The undersigned appreciates the Court's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rod Biermann".

Rod Biermann (RB 4724)  
Principal Attorney  
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Defendants' request that the case be stayed is DENIED. Defendants' request for an extension of time to respond to the Complaint is GRANTED. By **September 30, 2020**, Plaintiff shall serve Defendant Ivy Rentz and file proof of service. By **October 20, 2020**, Defendants shall answer, move or otherwise respond to the Complaint. The parties' attention is directed to the requirement for pre-motion letters per Individual Rule III.A.1.

SO ORDERED

Dated: September 28, 2020  
New York, New York

A handwritten signature in black ink, appearing to read "Lorna G. Schofield".  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

To: Clela Errington, Esq via ECF

<sup>1</sup> The undersigned was able to speak to Ms. Clela Errington, counsel for the plaintiff, prior to the filing of this letter and, at her request, I have agreed to accept service of the complaint on behalf of the defendant Ms. Rentz.